

EXHIBIT 7

From: [Jeff Gaddy](#)
To: [Will Lorensen](#)
Cc: [Peter Mougey](#); [Page Poerschke](#); [Laura Dunning](#); [Mildred Conroy](#); [Anthony Irpino](#); [Pearl Robertson](#); [James Young x6172](#); [Juan Martinez x2192](#); [Douglas Acklin x6133](#); [Katie Mayo](#); [Ashley Hardesty Odell](#); [Ronda Harvey](#); [Jennifer Newcome](#)
Subject: RE: Kroger / Plaintiffs discovery issues
Date: Wednesday, July 12, 2023 2:31:11 PM

Thank you, Will. We will get notices out for Matala and Cates. Thank you also for confirming that Ms. Capozziello will be the Harris Teeter 30(b)(6) designee which we agree will prevent the need for us to take her deposition. We can accept 9/8 for that deposition. We expect that deposition will be in person, so please let us know where it will occur.

As we mentioned on our call yesterday, we are not interested in receiving documents (or testimony) from Ms. Tucker related to any involvement she may have had with litigation strategy or defense of the instant opioid litigation. To that end, we are agreeable to setting a "stop date" that is earlier in time than the 5/19/21 date for which you have already pulled documents from her file. This should alleviate some of your concerns regarding potentially producing privileged documents, and will lessen the amount of documents that your team needs to review and produce. To help us set an appropriate date, we reiterate our request from yesterday that you let us know when Ms. Tucker would have begun engaging in such communications, and to please let us know how many of her documents hit on search terms on an annual basis.

Also, so that we can evaluate options that may help us keep the August depositions on schedule, please let us know how many of Ms. Tucker's documents, per year, include the future deponents (including Mr. Matala, Ms. Cates, and Ms. Capozziello). We understand these data points should be fairly easy pulls from your vendor.

Look forward to hearing from you,
Jeff

From: Will Lorensen <wlorensen@bowlesrice.com>
Sent: Tuesday, July 11, 2023 3:37 PM
To: Jeff Gaddy <jgaddy@levinlaw.com>
Cc: Peter Mougey <pmougey@levinlaw.com>; Page Poerschke <ppoerschke@levinlaw.com>; Laura Dunning <ldunning@levinlaw.com>; Mildred Conroy <mconroy@simmonsfirm.com>; Anthony Irpino <airpino@irpinolaw.com>; Pearl Robertson <probertson@irpinolaw.com>; James Young x6172 <JYoung@ForThePeople.com>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>; Katie Mayo <kmayo@levinlaw.com>; Ashley Hardesty Odell <ahardestyodell@bowlesrice.com>; Ronda Harvey <rharvey@bowlesrice.com>; Jennifer Newcome <Jennifer.Newcome@bowlesrice.com>
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Jeff,

Thank you for your time today. Here are updates on a few outstanding deposition items: